ireedom lextile

RCRIS UNIVERSE MAINTENANCE FORM Chemicals Co

EPA ID	P	A	D	0	O	2	3	2	l	7	8	

Facility Name Reilly	Whitema	n Walt	m Co.	
Source: N A SE	Notif	cation Date	1.17.94	
Waste Activity Type	RCRA Reg Status	RCRA Reg Description		
Generator Transporter TSD Burner	<u>R</u>			
HWF Market to Blender	HWF Other M	arket`	_ HWF Buner	
OSO Market to Burner	OSO Other M	arket	_ OSO Burner	
SO ACT: Burner Type: Utility Boiler Underground Injection Control		er	Furnace	
Recycler: Mode of Transportation: Air_ Other	Rail er		Water	
Process Code Information Source E or S (circle cor				
	AMT YPE , STATUS	AMOUNT .	NO. OF JOM UNITS	REPORT DATE

IR Inspection report Affidavit from the facility Revised Notification from the state Revised Notification from the facility Biennial report EPA clean closure certificate Documentation not required State documentation certifying clean closure Other Date to Data Entry 1.12.95 1.12.95 Date QAd						
Revised Notification from the facility EPA clean closure certificate Documentation not required State documentation certifying clean closure Other Date to Data Entry 153 1720-95		IR Inspection report		Affidavit from the fa	acility	
EPA clean closure certificate Documentation not required State documentation certifying clean closure Other Date to Data Entry 1.12.95 Batch Number 1.30.95		Revised Notification from the state		Affidavit from the s	state	
State documentation certifying clean closure Other Date to Data Entry 1:12:95 Batch Number 1:20:95		Revised Notification from the facility		Biennial report		• .
Date to Data Entry 1:12:95 Batch Number 153 1:12:95		EPA clean closure certificate		Documentation no	t required	
Batch Number 153		State documentation certifying clean do	sura			
Batch Number 153	·	Other			Date to Data Entry	1.12.95
1/20-95					·	153
Date QAd						1420-95
					Date QAd	



ACKNOWLEDGEMENT OF NOTIFICATION OF REGULATED WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal

facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other

EPA I.D. NUMBER

. PAD002351781

hazardous waste management reports and documents required under Subtitle C of RCRA.

01/26/95

FREEDOM TEXTILE CHEMICALS CO 801 HASHINGTON ST CONSHOHOCKEN , PA 19428 JAMES GATTO EHS MGR

INSTALLATION ADDRESS

801 WASHINGTON STREET CONSHORDCKEN PA 19428

EPA Form 8700-12A (6-90)

Copy to Dinds

RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM MAINTENANCE FORM FOR EPA NOTIFICATION

Noire Not you

STEM Ald

4/11/95

EPA-ID# 1 P1 A 1 D1 D1 D1 213151/17181/1 Date: 1-20	n 02-
FACILITY NAME Reilly Whiteman INC.	
	· -
New Facility Name	
Name Change Freedom Textile Chemicals CO	
Location of Installation	
Street	
City/TownStateZip	
County CodeCounty Name	· .
Installation Mailing Address	,
Street	· .
City/TownStateZip	·
Installation Contact	
Last Name Gatto First James	· .
Job Title Ehs Mar, Phone # 610.828-3	800
Street	
City/TownStateZip	
Ownership	
Name of Legal Owner FCC ADUISITION CORP	
street 1735 Market Street	
city/Town Philadelphia state PA zip 19	103
Phone #(215) 979-3100 Land Type P owner Ty	•
Waste Codes	
Delete Old Waste Codes Add New Waste Codes	
PAOI	
Updated in RCRIS by RR Date 1/24/	195
1-25	- 95

	Type	RCRA Reg.	RCRA Reg.
Waste		Status	Desc.
Activity			2000.
•			
Generator			
TSD			
Transporter Mode of Transport	rtation:		- 4
Mode of Italian	Rail Highw	ay Water	Other
Burner/Blender			
Burner/ brender	B Boiler and/c	T Industrial Furns	ice (RTF) only.
	D BIF only; Sm	elter Deferral.	100 (221) 0221.
	E BIF only: Sm	all Quantity Exemp	tion claimed.
•	N Not a Burner	/Blender, Verified	1.
	X Other Burner	/Blender Activity.	•
	Blank Unverified	1.	
HWF Market to B			
7	Code indicat	es that the handle	r is a generator
•	engaged in	marketing to burn	ners of hazardous waste
•	fuel activ		
	Blank No activit	EY.	•
HWF Other Marke		has black the Wandl	
	X Code indicat	tes that the Handle	er is engaged in
		marketing to burn	ng activities other than
HWF Burner	Aenerenar	merketing to burn	45.
	B Boiler and/	or Industrial Furn	aca.
·		of activity.	
OSO Market to B			•
		tes that the handl	er is a generator
			rs of off-spec. used oil
	fuel.		-
OSO Other Marke	it	•	
		tes that the Handl	
	marketing of	f off-spec. used o	il fuel other than
			(e.g., marketing to
060 Burner	used oil re	rinery).	•
OSO Burner		on Taduchaiol Suna	•
	B Boiler and/ X Indication	or Industrial Furn	460.
SO ACT:	Y INGREGION	or accivity.	·
	Code indica	ting that the hand	ler is engaged in
	marketing o	f specification fu	el oil activities.
	B Boiler and/	or Industrial Furn	ace.
!	X Indication	of Activity.	
Burner Types			
Utility 1	BoilerIndus	trial BoilerI	nd. Furnace
Underground In	jection Control_	,	
			er generates and/or
-	treats, sto	res, or disposes of	or negardous waste
Dagueland	and nas an	rulection well loc	ated at the installation.
Recycler:	C Commercial		
	R Non-Commercial	ial Recycler	
		ler, Verified	
	Blank Not a rec	ycler, unverified.	

arease print or type with ELLIE type (12 characters per inch) in the unshaded areas only

Please refer to the Instructions for Filling Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

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United States Environmental Protection Agency

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		ID - For Official Use Only
SPA 8 TEXA		
	vity (Mark 'X' in the appropriate boxes; Refer	
A. Hazaro	dous Waste Activity	B. Used Oil Recycling Activities
1. Generator (See Instructions) a. Greater than 1000kg/mo (2,200 lb. 100 to 1000 kg/mo (200-2,200 llc. Less than 100 kg/mo (220 lbs) 2. Transporter (Indicate Mode in box below) a. For own waste only b. For commercial purposes Mode of Transportation 1. Air 2. Rall 3. Highway 4. Water 5. Other - specify	bs.) required for this activity; instructions.	a. Marketer Directs Shipment of Uses Oil to Off-Specification Burner b. Marketer Who First Claims the Use Oil Meets the Specifications Used Oil Burner - Indicate Type(s Combustion Device(s) a. Utility Boiler b. Industrial Boiler c. Industrial Furnace 3. Used Oil Transporter - Indicate Type of Activity(ies) a. Transfer Facility 4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
V. Donariation of Management 1990 ct		
	es (Use additional sheets if necessary)	
Listed Hazardous Wastes /Coo.	40.000.000.000	
1 2 7 8	9 10	5 6 111 12 12
7 8 8 C. Other Wastes. (State or other wastes)	9 10	5 6 112 12 12 12 15 See Instructions.)
7 8 C. Other Wastes. (State or other was 1 2 P A 0 1	9 10 Ites requiring a handler to have an I.D. number,	5 6 112 12 12 12 15 See Instructions.)
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7 8 C. Other Wastes. (State or other was 1 2 PA01 Certification Certify under penalty of law that this do system designed to assure that qualified or persons who manage the system, or to best of my knowledge and belief, true, ac	stee requiring a handler to have an I.D. number; 3 4 Document and all attachments were prepared under the personnel property gather and evaluate the information of the persons directly responsible for gathering courate, and complete. I am aware that there are a securate, and complete. I am aware that there are a securate, and complete.	5 6 12 12 12 12 13 15 15 16 15 15 15 15 15 15 15 15 15 15 15 15 15
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To ther Wastes. (State or other waste) C. Other Wastes. (State or other waste) P A 0 1 Certification I certify under penalty of law that this do system designed to assure that qualified or persons who manage the system, or to best of my knowledge and belief, true, ac including the possibility of fine and impossibility of the and impossibility of the system.	secured and all attachments were prepared under the personnel property gather and evaluate the information personnel prop	der my direction or supervision in accordance with the information submitted. Based on my inquiry of the person of the information submitted is, to significant penalties for submitting faise information or print) Or print) Date Signed 1/11/95
7 8 C. Other Wastes. (State or other waster) 1 2 PA01 X. Certification I certify under penalty of law that this do system designed to assure that qualified or persons who manage the system, or to best of my knowledge and belief, true, acconcluding the possibility of fine and impossibility of fine and impossignature 3 3 4 4 4 5 5 6 6 7 7 8 8 8 8 9 9 9 9 9 9 9 9 9 9 9 9 9 9	secument and all attachments were prepared under the personnel property gather and evaluate the information personnel pro	der my direction or supervision in accordance with the information submitted. Based on my inquiry of the person of the information submitted is, to significant penalties for submitting faise information or print) Or print) Date Signed 1/11/95
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```
*
             RCRIS: Notification View Screen 2 of 6
*EPA Id: PAD002351781
                   Other Id:
                                        Merge Send: Y
*Date Received (MMDDYY): 081880 Source ( N/E/S ): N Non-Notifier Flag:
*Date Acknowledged (MMDDYYYY):
                         1
                                 Send Acknowledgement:
*Name of Installation: REILLY WHITEMAN INC
                Installation Location Address
        801 WASHINGTON STREET
*Streets:
*Citv:
        CONSHOHOCKEN
                                   PA
                              State:
                                       Zip:
*County Code: 091
                County Name: MONTGOMERY
                Installation Mailing Address
*Streets:
        801 WASHINGTON ST
*City:
        CONSHOHOCKEN
                              State: PA
                                       Zip:
                                             19428
                  Contact Information
  Last Name
              First Name
                               Title
                                          Phone Address (M, L, O)
* CHARLES
              TURRI
                           CHEMIST
                                       2158283800
*Streets: 801 WASHINGTON STREET
*City:
        CONSHOHOCKEN
                              State: PA
                                       Zip: 19428
*Land Type:
*******************************
* Enter-Continue
                   F1-Previous Screen
                                     F3-Exit
*********************************
*******************************
             RCRIS: Notification View Screen 3 of 6
************************
* EPA Id:
                     Other Id:
          PAD002351781
                                         Source:
* Owner Sequence Number:
 Ownership: OWNERNAME
                                          Type of Owner:
                  Address of Owner/Operator
     Street: OWNERSTREET
                              State: AK Zip Code
     City:
           OWNERCITY
     Phone: 2155551212
 Current/Previous Indicator: CO Change Date (MMDDYY):
*******************************
* Enter-Continue
              F1-Previous Screen
                              F3-Exit
                                            F5-Curr. Owner
* F6-Prev. Owner
                 F8-Help
                              F9-First
                                            F10-Next
******************************
*******************************
             RCRIS: Notification View Screen 4A of 6
**************************
                    Other Id:
* EPA Id:
       PAD002351781
                                      Source: N
                        RCRA Req
                                RCRA Req
                                                State Req
                                       State Req
* Waste Activity
                                 Desc
                        Status
                                         Status
                    Туре
                                                  Desc
* HW Generator:
                          N
                                  1
                    1
* HW TSD:
* HW Transporter:
  Transport Mode: Air: Rail:
                               Highway:
                                        Water:
```

Other: HW Burner/Blender: * NHW Used Oil Recycler: Underground Injection Control: Recycler: * Enter-Continue F1-Previous Screen F3-Exit F8-Help ************************ RCRIS: Notification View Screen 5 of 6 EPA Id: PAD002351781 Other Id: Source: Hazardous Waste Codes: Specific/Non-Specific/Commercial/Chemical D002 **********************

*Enter-Continue

F1-Previous Screen

F3-Exit

*F8-Help

F9-First

F10-Next

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

.4			*			
Date of Inspection χ	117 94 1	me start 10:4	Dam Time finish	10:50 am		
Name of Inspector \underline{Q}	Handke		· · · · · · · · · · · · · · · · · · ·			
	name Keilly-w					
Location <u>%O1 w</u>	whirston street	t, Constor	nocken, PA 194	38		
County Mentager			v Controlocite			
Identification number	<u>871286050A9</u>	.1				
Name of responsible o	fficial Jim Gatto)				
	nertal Mana					
Mailing Address 🔀 🗅	1 washington	Street, Con	stronocken, PA	10,438		
	ne number 610183					
Name of person interv	iewed Jim Gat	10	· · · · · · · · · · · · · · · · · · ·			
Title Environm	rental, Health	1009 20	Lety Maraga	-		
	erent from above) \$			· · · · · · · · · · · · · · · · · · ·		
Area code and telepho	ne number <u>Same</u>	,				
Current waste ha	ndling method:					
a. □ On-site	treatment,	□ storage,	disposal	□PBR		
b. □On-site		reuse,	□ recycle,	□reclaim		
c. ⊠Off-site	treatment,	⊠storage,	⊠disposal			
d. ⊠Off-site		reuse,	⊠recycle,	☐ reclaim		
u. Mon-site	use,		ZVecher.			
	dous waste produced:			•		
a> 100	DKg	kg./mo.				
b		kg./yr.		•		
3. Types of hazard	ous waste produced by	Hazardous Waste	Number and destinati	on facility (includ		
location and type						
Waste Number	Destination	Facility	Location ar	nd Type		
Dool	Chem Met So	<u> </u>	111100000000000000000000000000000000000	<u>γ</u> Γ		
boog	Chem Mex Se	,	wantette m	7		
PAOL	EWR	, 0,00	Conn			
		······				
						
			<u> </u>			
	 					

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT **GENERATORS - PART B**

Site Name	Reily-Wniteman	ID Number	PA0002351781	Date \\	17194
					

Hazardous Waste Inspection Report Generators - Part B

	STA	TUS		DECLUREMENT	CHAPTER	LINE
1	2	3	4	REQUIREMENT	CITATION	ITEN
X				Hazardous waste determination, performed on all waste streams	262.11	Н00
X				Identification number	262.12	Н00
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	Н00
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	Н00
X				PA manifest used for intrastate shipments	262.20(b)	H00
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	Н00
X				Manifests filled out properly and completely	262.20(g)	H00
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H00
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)	Н00
X				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H01
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H01
X				Placards offered to transporter	262.33	H01
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H01
		X		Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H01
;		X		Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H01
X				a). All containers of haz, waste in good condition	265.171	H01
X		Г		b). Containers compatible with hazardous waste being stored within	265.172	H01
Z				c). Containers of hazardous waste kept closed	265.173(a)	H01
\overline{X}				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H01
		X		e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H02
		X		f). Haz. waste accumulation areas inspected at least weekly	265.174	H02
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176177	H02
X				h). Proper containment and collection system(s)	265.178	H02
		X		Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H02
∇				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H02

Hazardous waste inspection Report Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance STATUS LINE **CHAPTER REQUIREMENT** CITATION ITEM 2 3 4 Records retained at designated location for 20 years 262.40(a) H026 Quarterly reports submitted to the Department 262.41(a) H027 Exception reporting procedures followed 262.42 H028 Hazardous waste disposal plan, if required 262.45 H029 Spill reporting procedures followed H030 262.46(a) Preparedness, Prevention and Contingency Plan developed and 262.46(e) H031 implemented in accordance with Chapters 264 and 265 Special requirements followed for international shipments 262.50,.53, H032 .55, .60 Source reduction strategy prepared and available 262.80 H033

BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

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BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection Nov. 17, 1994	Identification Number PADOD 351781
Company/Facility/Site Name Reilly Whiten	cowalton Co.
The following lines were	marked not determined:
Line #HO14: Reilly writer	ran Walton Cas hazardous
waste oil storage tank a	orrently does not have
proper containment, m	ir. Gatto stated that since
	d as a bazardous wask.
- re has been working	on getting containment for
the tank It is sagge	ested that the tank be paperly
contained by-purious	30, 1995 to meet the Comper
reautrements of 35kg	a Clarke Chapter 365. 5 Dampter
	HOBY: On this date, one
	zardous waste was on site.
The drom was labelle	I sower waste with the
accomplated date	encient due to a recent rain.
It was suggested that	ra hazardous waste label
	drums, which will include
the occumulation dat	e, waste type and waste
number. An inspectio	n log was not ovailable for
the toporthis wask	container storage area It
	ing be maintained For the
inspections of the stor	
	dustion strangy was proposed
forther rordus was	skoil, but not for the Debland
1707 wask streams	Et was siggested that a
400 recollection strawe	ey or prepared for these wast
streams	•
formal notification of any violations observed during the inspect either violations noted herein, or other violations identified as a res This report does not constitute an order or other appeals deemed to grant or imply immunity from legal action for any violat	able action of the Department. Nothing contained herein shall be ion noted herein. ily imply concurrence with the findings on this report, but does
Person interviewed (signature)	Jah CECA Date 1/1/94
Inspector (signature) Jaul & Harollie	Date 11 31/94
3	5.E

DER-RECEIVED SOUTHERST RECION

OCT 26 7002 REILLY-WHITEMAN INC. INDUSTRIAL PROCESS OILS AND CHEMICALS TOLL FREE 800-533-4514



CONSHOHOCKEN PA 19428 TELEPHONE: 215 828-3800 FAX: 215 834-7855

October 21, 1992

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES Ms. Maura L. Trimble Waste Management Specialist Lee Park, Suite 6010 555 North Lane Conshohocken, Pa 19428

RE: Hazardous PADER Waste Site Inspection; Notice of Violation Response Letter

Dear Ms. Trimble,

This letter is in response to the Notice of Violation letter submitted to Reilly-Whiteman, Inc. by PADER, Field Operations Waste Management Division. The two violations which you have identified; namely, the hazardous waste determination on the waste water treatment sludge and the liquid material in the tank farm containment area have both been addressed.

The sludge generated from our on site waste water treatment activity is categorized as non Hazardous, non regulated material. Sabre Environmental Services handles the disposal of our filter cake sludge and transports the drummed material to Chem-Met Services in Wyandotte, Michigan. An analysis of the filter cake sludge conducted in February 1992, categorized the sludge as non hazardous. Attached are copies of both the generator waste analysis form completed by Sabre Environmental Services and the acceptance letter for our filter cake from Chem-Met Services. Based on the supplied information, I feel Reilly-Whiteman is not in violation of Section 103 of the act (35 P.S. SS G018.103); generation of a solid waste.

With regard to the PADER identified spilled/leaked liquid material in the tank farm containment area, the leak resulted from a faulty valve on one of the oil storage tanks located in the tank containment area. The material was identified as raw fish oil which leaked from the faulty valve. The fish oil was pumped out of the tank farm area to our onsite waste oil storage tank. The valve also has since been replaced. As a result, the potential pollution threat has been eliminated.

Reilly-Whiteman, Inc. also is in the process of evaluating several alternatives to upgrade both the appearance of the tank farm containment area and also to improve the visible aesthetics of the area. As a result of our planned improvement and upgrade. I feel that Reilly-Whiteman will not be in violation of Act 97 and the Clean Streams Law of PA. The upgrade and improvement of the tank farm containment program will be completed within the next two years. (Goal 1993-1994)

If you have any questions concerning our response to the afore mentioned violations, please feel free to contact me.

Very truly yours,

Reilly-Whiteman, Inc.

James D. Gatto

Environmental Manager

JDG/ht

cc: Bernie Nosek

ATTEN: JIM GATTO



CHEM-MET SERVICES, INC. 18880 ALLEN ROAD POST OFFICE BOX 2169 WYANDOTTE, MICH, 48192

SABRE ATTN:BERNIE MOSEK SABRE ENV BERVICES 21 NO MAIN ST WOODSTOWN NJ 08098 PADOO2351781 REILLY WHITMAN 801 WASHINGTON STREET

CONSHOCKEN PA 19428 92/02/26

215-828-3800

Dear Generator/Customer!

In response to your request, Chem-Met Services, Inc. wishes to notify you concerning the disposal of the following:

Analysis Number Proper DOT Shipping :RE178158

:Non Regulated Material

Description

:Filter Cake

Waste Code(s)

:029L

D.O.T. ID.

:NA

()

Spc. Handling Instr.

ANALYSIS # and WHO TO BILL must appear on every manifest to be accepted at Chem-Met Services.

Flasse be advised that this waste has been accepted for disposal under the provisions of our State of Michigan, Act 64 Hazardous Waste Facility Operating License, and our U.S. EPA interim status operating authority.

IMPORTANT NOTE: Analysis # MUST appear on all manifests, drums, and correspondence concerning this material. Please put the analysis # in box J on each manifest. The analysis # on the drums will speed up processing time at Chem-Met Services, Inc., reduce the risk of rejection, and increase the mafety to employees sampling your waste.

Chem-Met Services, Inc. reserves the right to reject any and all waste on receipt at our facility. A properly completed Michigan manifest is required for all materials.

Flease call our Dispatch Office, your chemical broker, or transporter to

arrange for a pickup or delivery schedule.

Any changes in the composition of this waste stream, process design modification, feedstock changes or increases in the amount of waste to be generated should be reported to Chem-Met Services, Inc. We will determine if additional sampling and analysis are necessary.

If you have any questions regarding our processing, regulatory control or compliance please do not besitate to call.

We look forward with confidence to being of service to you.

William R. Hartman Vice President



Chem Met Services, Inc. 18550 Allen Rd. P.O. Box 2169 Wyandotte, MI 48192

Phone:

(313) 282-9250 (800) 282-9251 (313) 282-1655 FAX: MID 096963194 EPA ID:

GENERATOR WASTE ANALYSIS FORM

BILLIN	SABRE ENVIRONMENTAL SERVICES	TCLP	_ EP TOX	_TOTAL	_ SEE ATTACHED
Add	21 N. MAIN ST.	EDA HAW CO	NTAKINANT	REG	LEVEL (mg/l) ANALYTICA
,	City WODSTOWN State N.J. Zp 08098	NUMBER	MINMENNE	ned,	
Con	BERNARD E. NOSEK Phone 609-769-3311 FAX 609-769-386	58 D001 D002	Ignitable Corrosive Reactive		>100 F <140 F NL ph-2 or >12.5 NC Oyenido (250)
WAST	TE GENERATOR EPA LD. PADO02351781	,	,		Sulfide (500)62
N	REILLY WHITEMAN	METAL CHA	RACTERISTICS: Arsonic		5.0
	801 WASHINGTON ST.	D006 D006	Barium Cadmium	• .*	100.0
	City CONSHOHOCKEN State PA. Zip 19428	D007	Chronium		5.0
	Tamon D. Catto 215 020 2000 627 70	. D008	Lead Mercury		50
Con	James D. Gatto Phone 215-828-3800 FAX 834-78	D010	Selenium Silver		1.0
GENE	FRALDESCRIPTION FILTER CAKE FROM	0010	Copper		100.0
OFV	WASTE & PROCESS SOAP MF &	003D	Zinc		500.0
	NTITY 16 STOrums () Yards () Tons PER () Week St Month () Year () Once	ORGANIC C	HARACTERISTIC	::	0.02
CUAN	ATTIA TOS () LINGS () LOUZ LELL () MOSEL () AND LILL () AND () AND () AND () AND () AND ()	D012 D013	Endrin Lindane		0.4
	OR COMPONENTS: 1% (10,000 mg/kg) or greater of waste content. Total major and minor	D014	Methoxychlor		10.0
comba	onents must add up to 100%.	2015	Toxaphene	na stoonware	0.5
	CONTINUENT OF LUREIN PERCENT CORENTALIEN	D017	2.4.5-TP (Siver		1.0
	SILICA SAND 85-95 %	D018	Benzene	•	0.5
		D021	Chlorobenzene		100.0
	WATER 5-10 70	D022	Chioroform		6.0
		0023	e-Cresal		200.0
PHYS	SICAL STATE () Solid () Liquid of Shudge % Solid % Liquid	D024 D026	m-Cresol p-Cresol		200.0
YES	NO YES NO YES NO	D026	Cresal		200.0
M	() Pumpable () () Pourable () (5 Reactive	5027	1,4-Dichloroben		7,5
1)	() () (Radioactive () () Toxic	D028	1,2-Dichloroeta		0.5
i)	6Q Corrosive () 60 kms.nt () 60 Odor	D029 D030	1,1-Dichloroeth		0.7 0.13
()	6d Explosive () be infectious () be Dusting Hazard	D031	Heptachlor		0.008
· (i	H Flammable ±205 Resh Point pH 6-9	D032	Herachloroben		0.13
• •	MENTS:	0033	Hexachiorobuta		0.5 3.0
COM	METIO.	D034 D036	Hexachloroetha Methyl Ethyl Ke		200.5
	•	. D036	Nitrobenzene		2.0
,		D037	Pentachlorophe	nal .	100.0
		D038 D039	Pyridine Tetrachlomethy	lana	50
		D040	Trichloroetyler		ō.s
/ \ DA	TARROWE WASTE 44 NON HAZARRONE WASTE	D041	2,4,5-Trichlorop		400.0
	IZARDOUS WASTE 64 NON-HAZARDOUS WASTE. I hazardous waste nuncets from R.C.R.A. and Michigan Act 64 rules.	D042	24.6-Trichlorop	henol	20
		D043	Vinyl Chlorida PCB	•	50.0
	by contrily that all information submitted in this and all attached documents are complete and accurat that all known or suspected hazards have been disclosed. G.M. 2-27-92 Generator Signature Trite Date				,
r			·····		
	CHEM MET INTERNAL USE ONLY LAB APPROVAL AWALYSIS		 		
	N/A NA1963 NA9189 UN1325 UN1759 UN1760 Hzzard Class Unit Codo Waste Codes	UN1993	-		
	() Approved () Breker () Rejocted Authorization	Date			1
	Description:				
	Comment				



REILLY-WHITEMAN INC. Conshohocken, Pennsylvania 19428 INDUSTRIAL PROCESS OILS AND CHEMICALS

Telephone: 215-828-3800 CABLE ADDRESS: WHITEMAN PHILADELPHIA

April 28, 1981

Miss Marjorie Kaplan EPA, Region III RCRA Administrative Support 3EN 24 6th and Walnut Streets Philadelphia, PA 19106

Dear Miss Kaplan:

Following our phone conversation of April 28, we hereby authorize you to include on Page 3 of 5 on Form 3 Process Codes SO2 and TO1.

Yours sincerely,

REILLY-WHITEMAN INC.

Charles Turn

Charles A. Turri

CAT:pb

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Billy-Whiteman Tue	FROM: William Budd	DATE 7/3/84
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS
PHILADELPHIA. PENNSYLVANIA 19106

July 7, 1981

Mr. Charles Turri Reilly-Whiteman Inc. 801 Washington Street Conshohocken, PA 19428

Re: EPA I.D. No. PAD 00 235 1781

Dear Mr. Turri:

EPA has completed its initial review of your application for a permit to treat/store/dispose of hazardous waste under the Resource Conservation Recovery Act ("RCRA"). From the information provided it appears that you are not required to obtain a RCRA permit in accordance with 40 CFR Part 122.21(d)(2). Under this section, a generator is allowed to accumulate hazardous waste on-site for up to 90 days, in accordance with 40 CFR Part 262.34, without a RCRA permit. This section also states that owners or operators of an "elementary neutralization unit" or a "wastewater treatment unit," as defined in 40 CFR Part 260.10, are not required to obtain RCRA permits. These are defined as follows:

- A) Elementary Neutralization Unit means a device which:
 - (1) Is used for neutralizing wastes which are hazardous wastes only because they exhibit the corrosivity characteristic defined in \$261.22 of EPA's Hazardous Waste Regulations, or are listed in Subpart D of Part 261 of EPA's Hazardous Waste Regulations only for this reason; and,
 - (2) Meets the definition of tank, container, transport vehicle, or vessel in \$260.10 of EPA's Hazardous Waste Regulations.
- B) Wastewater Treatment Unit means a device which:
 - (1) Is part of a wastewater treatment facility which is subject to regulation under either Section 402 (NPDES Permit Program) of Section 307(b) (Pretreatment Requirements) of the Clean Water Act; and,
 - (2) Receives and treats or stores an influent wastewater which is a hazardous waste as defined in \$261.3 of EPA Hazardous Waste Regulations, or generates and accumulates a wastewater treatment sludge which is a hazardous waste as defined in \$261.3 of EPA's Hazardous Waste Regulations, or treats or stores a wastewater treatment sludge which is a hazardous waste as defined in \$261.3 of EPA Hazardous Waste Regulations; and,

- (3) Meets the definition of tank in \$260.10 of EPA's Hazardous Waste Regulations.
- C) Tank means a stationary device, designed to contain an accumulation of hazardous waste which is constructed primarily of non-earthen materials (e.g. wood, concrete, steel, plastic) which provide structural support.

You should be aware that EPA is concurrently proposing to modify Parts 122, 260, 264 and 265 to establish special standards and permit requirements for the owners/operators of these facilities. Under this proposal, which is also contained in the November 17, 1980 Federal Register, these owner/operators would be granted a permit-by-rule as long as certain requirements, proposed in Part 266, were met. Also, the permit-by-rule could be terminated for violation of the Part 266 standards or where additional requirements are found to be necessary to protect human health and the environment.

EPA is returning your permit application since the information contained therein does not demonstrate that the facility is required to obtain a permit under Section 3005 of RCRA. If EPA's interpretation of the application is incorrect or if the application itself is incorrect and the facility is in fact one which is required to have a permit under Section 3005 of the Act, a complete RCRA Part A Application (EPA Forms 3510-1 and 3510-3) must be completed and resubmitted to this office by August 7, 1981 . If hazardous waste is handled at the facility referenced above and the applicant fails or refuses to submit a complete Part A Application within this period, appropriate enforcement action may be taken.

If you have any questions, or need assistance, please contact Bill Walsh at (215) 597-1230.

All replies should be addressed to:

U.S. Environmental Protection Agency Permits Enforcement Branch 6th and Walnut Streets Philadelphia, PA 19106 Attn: Ms. Shirley Bulkin

Sincerely yours,

Shirley D. Bulkin RCRA Administrative Support Section Permits Enforcement Branch

COMMUNICATION V	OTHER (SPECIFY)			
	FROM:	(Record of item che	DATE	
			9/	28
Charles Tulli	M. KAPU	m	TIME /1.0	/
Reily-Whiteman, Inc	(215)	828-38	800	
NO Process codes in Descrip				
-will send a letter	ASAP			
CLUSIONS, ACTION TAKEN OR REQUIRED				
ORMATION COPIES				



REILLY-WHITEMAN INC. Conshohocken, Pennsylvania 19428 INDUSTRIAL PROCESS OILS AND CHEMICALS

■ Telephone: 215-828-3800 CABLE ADDRESS: WHITEMAN PHILADELPHIA

March 23, 1981

Ms. Shirley D. Bulkin
Chief, RCRA Administrative Support Section
Permit Enforcement Branch - Enforcement Div.
United States Environmental Protection Agency
Region 111
6th & Walnut Streets
Philadelphia, PA 19106

CERTIFIED MAIL

Dear Ms. Bulkin:

Enclosed is the information requested in the enclosed letter.

Yours sincerely,

REILLY-WHITEMAN INC.

Charles A. Turri

CAT:pb

Enc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS PHILADELPHIA, PENNSYLVANIA 19106

MAR 1 7 1981--

Certified Mail Return Receipt Requested

Mr. Charles Turri Reilly-Whiteman, Inc. 801 Washington St. Conshohocken, PA 19428

Hazardous Waste Permit Application--Incomplete Application

EPA I.D. Number:

PAD 00 235 1781

Facility Name:

Reilly-Whiteman, Inc. Facility Location: 801 Washington St.

Conshohocken, PA 19428

Bear Mr. Turri:

The Environmental Protection Agency (EPA) has reviewed for completeness Part A of a RCRA permit application for the facility referenced above. The Agency has determined that the Part A permit application is incomplete. The items we found missing from the application are marked on the enclosed check list. All missing items marked with an asterisk (*) should be completed on the application form and the form returned to this office by April 17. 1981.

If the applicant fails or refuses to correct the deficiencies in the application within the time set forth above, the Agency may (1) determine that the applicant failed to qualify for interim status; (2) deny the permit; and (3) commence enforcement action under applicable statutory authority, including Section 3008 of the Resource Conservation and Recovery Act.

If you have any questions, please contact Joan Henry on (215) 597-8751 or Bill Walsh on (215) 597-1230.

Sincerely yours, herley D. Bulken

Shirley D. Bulkin

Chief, RCRA Administrative Support Section

Permit Enforcement Branch

Enforcement Division

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

6TH AND WALNUT STREETS PHILADELPHIA, PENNSYLVANIA 19106

EPA I.D. # PAD002351781

December 11, 1980

Reilly- Whiteman Inc. Mr. Charles Turri 801 Washington Street Conshohocken, Pa. 19428

Re: Acknowledgment of Application for a Hazardous Waste Permit

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility located at the address shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

Commonwealth of remissiveme Department of Environmental Resources Bureau of Waste Management

Inspection Report Comments

Date of Inspection 16 SEP 9.2 Identification Number	
Company/Facility/Site Name REILLY WHITEMAN INC	
REILLY WHITEMAN CURRENTLY HOLDS 2 EPA HAZAR GENERATOR NUMBERS:	eooos waste
PAD 980715296 - FOR THE PHILADELPHIA SITE	
PADO02351781 - FOR "REILLY WHITEMAN WALT	DN AND IS
LISTED AS A SUPERPUND NUMBER.	Ala bala D 13
IF ANY WASTE STREAMS ARE DETERMINED TO BE HAT	ZARDOUS, REILLY.
WHITEMAN SHOULD NOTIFY BOTH THE EPA AND THE S	,
GENERATING STATUS. OR OF ANY CHANGE IN STATE	vs
· · · · · · · · · · · · · · · · · · ·	
	,
000 .011 11	citations listed on this inspec- vironmental Resources, Bureau own in this report. This inspec- nspection. Violations may also not records. Additional notifica- not violations. thing contained herein shall be dings on this report, but does
Inspector (signature)	Date 30 SEP 92

Department of Environmental Resources
Bureau of Waste Management

Inspection Report Comments

Date of Inspection 16 SEP 92 Identification Number NON NOTIFIER
Company/Facility/Site Name REILLY WHITEMAN INC.
OTHER AREAS OF CONCERN OBSERVED DURING THE INSPECTION
RAIL TANK CAR: THE TANK CAR SHOULD BE LABELED AS TO
ITS CONTENTS AND CONTAINMENT PLACED AROUND THE CAR
TO CONTROL ANY LEAKED OR SPILLED MATERIALS
SOUTH DIKE AREA: THE SUMP IS OVERFLOWN AND WOULD BE
USELESS IN ABATING A MATERIALS SPILL. THIS SUMP SHOULD BE
PUMPED OUT.
DRUM STORAGE AREA: THE THREE TANKER TRUCKS SHOULD ALSO
BE LABELED AS TO CONTENTS AND WITH ANY OTHER APPROPRIATE
SHE SIGNS: "FLAMMABLE" "NO SMOKING" ETL
THE DRUMS IN THIS AREA SHOULD BE PROPERLY LABEEED AND
STORED IN AN APPROPRIATE CONFIGURATION. ANY DAMAGED DRUM
SHOULD BE MANAGED TO PREVENT LEAKAGE, THIS INCLUDES REPLACING
OR SUERPACKING DRUM. ALL DRUMS SHOULD BE EITHER CLOSED
WITH A BUNG OR ALID. A FEW DRUMS WERE WITH OPEN TOPS
E ALSO SOME SHOWED SIGNS OF DETERIORATION. A HAZARDOUS WASTE
DETERMINATION SHOULD BE MADE ON THE DRUMS IN THIS STORAGE ARE
In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements. This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person Interviewed (signature) COPY MAILED TO FACILITY Date
Inspector (signature) Philippina A Puralle Date
Page of

Recycled Paper

Commonwealth or rennsylvania Department of Environmental Resources Bureau of Waste Management

Inspection Report Comments

Date of Inspection 16 SEP 92 Identification Number NON-NOTIFIER									
Company/Facility/Site Name REILLY. WHITEMAN INC.									
THE TANK FARM APPEARS TO BE SEVERLY MISMANAGED. SEVERAL									
INCHES OF DARK COLDRED LIQUID WAS LYING WITHIN THE CONTAINMENT									
STRUCTURE AND IT APPEARS TO HAVE BEEN THERE FOR SOMETIME. THE									
CONTAINMENT STRUCTURE WAS VISIBLY STAINED WITH CURRENT AND									
PREVIOUSLY SPILLED MATERIAL. ALL SPILLED MATERIALS SHOULD									
BE CLEANED UP ALONG WITH OTHER SOILED AREAS IN AND AROUND									
TANK FARM AREA. THE CURRENT CONDITION IS IN VIOLATION									
OF ACT 97 AND PENNSYLVANIA CLEAN STREAMS LAW. THE TANK									
FARM SHOULD BE INSPECTED ON A RELUCAR BASIS TO PREVENT FUETHER									
LEAKING OF MATERIALS FROM TANKS AND PIPING.									
THE WASTE WATER TREATMENT TANKS AND PIPING WERE ALSO OBVIOUSLY LEAKING DURING THE INSPECTION. REPAIRS WERE NECESSARY IN SEVERAL AREAS. IF REILLY WHITEMAN OBTAINS PERMIT BY PULE STATUS, THIS AREA WOULD HAVE TO COMPLY WITH CHAPTER ZOS REQUIREM WHICH INCLUDE AT LEAST WEEKLY INSPECTIONS OF TREATMENT PROCESS AND ASSOCIATED EQUIPMENT									
PLEASE SUPPLY THE BUREAU OF WASTE MANAGEMENT WITH A COPY OF									
REILLY-WHITEMAN'S PREPARETHESS PREVENTION & GONTINGENCY PLAN! (CONTINUED)									
In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements. This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person. Person Interviewed (signature) MAILED TO FACILITY Date Date 30 SEP 92									
Page of									

the transmitted and an interest from

Recycled Paper

Department of Environmental Resources Bureau of Waste Management

Inspection Report Comments

Date of Inspection 16 SEP92 Identification Number NON-NOTIFIER
Company/Facility/Site Name REILLY. WHITEMAN INC.
ON'SHE TO CONDUCT A JOINT INSPECTION WITH AIR & WATER QUALITY,
INSPECTORS INCLUDED DESIREE HENNING, ALAN EVERETT, MATT KASE &
BRAO GINNINGHAM.
RELLLY WHITEMAN HAS ON SITE TREATMENT OF THEIR PROCESS WASTE
WATER WHICH IS ALLOWED TO DISCHARGE TO THE SCHUYLKILL RIVER
VIA AN NPDES PERMIT. THE SLUDGE GENERATED FROM THIS
PROCESS IS DRUMMED & HELD IN STOPAGE IN AN OFF. SITE WAREHOUSE.
A HAZAROOUS WASTE DETERMINATION SHOULD BE CONDUCTED ON THE
SLUDGE IN ACCORDANCE WITH CHAPTER 262.11 OF PENNSYLVANIAS
HAZARDOUS WASTE REGULATIONS (COPY ATTACHED). IF THE
SLUDGE OR ANY OTHER REILLY WHITEMAN WASTE STREAM IS DEEMED
HAZARDOUS, REILLY WHITEMAN SHOULD COME INTO COMPLIANCE WITH
ALL RULES AND REGULATIONS OF PENNSNLVANIA GODE TITLE 25 CHAPTERS
260-270 HAZARDOUS WASTE REGULATIONS.
RELLY WHITEMAN SHOULD CONTACT LARRY LUNSK, DER FACILITIES
MANAGER, \$215) 832.6212) TO INQUIRE ABOUT "PERMIT-BY RULE"
STATUS FOR THE WASTE WATER TREATMENT OPERATION.
(CONTINUED
In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspetion report as a reference to obtain a detailed description of compliance requirements. This inspection report is official notification that a representative of the Department of Environmental Resources, Bur of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspetion report shall serve a formal notification of any violations which were observed during the inspection. Violations may be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall deemed to grant or imply immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but dacknowledge that the person was shown the report or that a copy was left with the person.
Person Interviewed (signature) Date
Inspector (signature) Liquida Junity Date 30 SEP 92

Hazardous Wasto Inspection Report Generators — Part B

	C4.				Chapte
_T -	2	tus 3	4	REQUIREMENT	Citatio
+			*	Hazardous waste determination, copies available	262
+			Pa	Identification number	.12(
\dashv		×		Hazardous waste shipments offered only to licensed transporters	
+				Authorization received from TSD facility for wastes shipped off-site	.12(
\dagger			-	PA manifest used for intrastate shipments	.13
\dagger		-}-		Disposer state manifest or EPA format manifest used for out-of-state shipments	
+		-		Manifests filled out properly and completely	,20(
+				Manifests routed properly and within time limits (7 days)	.20(
+		-		Proper U.S. DOT shipping containers or packages	.23(e)o
+			\dashv	Shipping containers marked and labeled according to U.S. DOT	
+		-		Containers of 110 gel. or less marked with required PA label	.30(
+			\dashv	Placards offered to transporter	.30(
\downarrow				Wastes accumulated on-site for less than 90 days	.33
+	\dashv	-{-	-	Wastes stored in proper containers and properly marked and labeled	.34(
╬		╂┤		Containers managed in accordance with 265.171177	.34(
╁		╂┤	\dashv	Containers clearly marked with accumulation date and visible for inspection	.34(
+		┪┥		Records retained at designated location for 20 years	.34(
+		┨┤	-	Quarterly reports submitted to the Department	.40
╁			_	Exception reporting procedures followed	.42
+		╂┤	\dashv	Hazardous waste disposal plan, if required	
-		┨┤	\dashv	Spill reporting procedures followed	.45
\vdash	_	1	_	Preparedness, Prevention and Contingency Plan and implemented	
\vdash		1	$\overline{}$	Special requirements followed for international shipments	.46(
\dagger	\dashv		+	On the job or classroom personnel training program 265.16	.34(a)
\dagger	\dashv	×	_	Orum accumulation area inspected weekly as per 265.174	.34(a)
		-	X	TANK FARM CONTAINMENT AREA SPILLAGE	.46 (c
		- 1			



Hazardous Waste Inspection Report Generators — Part A

PAD 00 235178/

Date of inspec	tion 165	EP 92	Time start	10:15 am	1	ime finish	· · · · · · · · · · · · · · · · · · ·
Name of inspe	ctor	· L. TRIMBLE /	B. CUNNII	NAHAM			
		REILLY W					
		HINGTON ST				54	
County	AONT60M	ery	M	lunicipality	CONSHE	HOCKEN B	0 Q0
Identification n	umber					·	
Name of respo	nsible officia	DAVID J.	SALABS	KY	· · · · · · · · · · · · · · · · · · ·	····	
Title	PLA	HT MANAGE					
Mailing address	s <u>801</u>	WASHINGTON	1 55				
Area code and	telephone ni	umber (215)	828.380	0			
		DAVID SA					· · · · · · · · · · · · · · · · · · ·
Title		PLANT MAI	5 / EHAIL	SOMMENT!	AL MAI	JAGER	
Mailing addres	S (if different	from above)	AME		· 		
Area code and	telephone ni	umber					
1. Current wa							
	□ On-site		□ storage.		disposal	⊠ PBR	DOSSIBLE
		use,			recycle,		PBR STATUS
		treatment,			-		
	□ Off-site	use,	-		recycle,	☐ reclaim	
2. Amount of	hazardous w	vaste produced:				•	•
a	NOT	DETERMINE	0	kg./mo.			
b				kg./yr.			
3. Types of h Waste Nu		ste produced by Ha Destir	zardous Waste nation Facility	Number and c	lestination	facility (include l Location and	ocation and type). Type
		NOT	DETERMIN	1ED			
						· · · · · · · · · · · · · · · · · · ·	
							

FORM				ECTION AGENCY	I. EPA I.D. NUMBER		· .		1
SEPA	Co	nsolidate	d Patoliils F	MATION Pogrami	FPAD002	3 5	17	7 7 7 8	1
SENERAL LABEL ITEMS	(Read the "C	General In	strustions.	"rbefore starting.)	1 2 GENERAL	 -		<u>, , , , , , , , , , , , , , , , , , , </u>	3
I. EPA I.D. NUMBER		E	RARET	NON XI	If a preprinted laber it in the designated ation carefully; if a	el has be space. F ny of it	en pr Review	rovided v the	ir t
III. FACILITY NAME		/ JADA	MIN	SACTO /	through it and ento appropriate fill—in the preprinted date	area belo	w. A	Iso. if	1
V. FACILITY MAILING ADDRESS	PLEASE PLA	CE LA	BEL IN	THIS SPACE	left of the label s that should appear, proper fill—in area	pace list , please	pro	<i>infor</i> ide it	m
					complete and correct Items I, III, V, and	ct, you d VI	need xcept	not co	3 Ot
VI. FACILITY					must be completed items if no label hat the instructions for	s been i or - detai	provid led i	ded. F item	₹e d
					tions and for the which this data is co		thoriz	ation	5
II. POLLUTANT CHARACTERIS	TICS				1 3	14	14.6	1	
INSTRUCTIONS: Complete A questions, you must submit this if the supplemental form is attactive excluded from permit requirem	form and the supplement ched. If you answer "no"	tal form l to each o instruction	isted in th question, y ins. See als	e parenthesis following the counced not submit any of t	question. Mark "X" in the these forms. You may ans	box in t wer "no'	he thi ' if yo terms	ird co our act	ti
SPECIFIC QUES	TIONS	YES NO	FORM ATTACHED		C QUESTIONS		YES	NO A	<u>_</u>
A. Is this facility a publicly of which results in a discharge (FORM 2A)		x			d animal feeding operation facility which result	ion or		X	_
C. Is this a facility which curre to waters of the U.S. other A or B above? (FORM 2C)		15 17 X	24	D. Is this a proposed faci	lity (other than those des		19	20 X	_
E. Does or will this facility the hazardous wastes? (FORM 3)		X 25 29	30	F. Do you or will you in municipal effluent bel taining, within one of		n con- bore,	31	X 32	_
G. Do you or will you inject at the water or other fluids which a in connection with convention duction, inject fluids used for it or natural gas, or inject fluids used for natural gas, or inject fluids used fluid	ne brought to the surface nal oil or natural gas pro- or enhanced recovery of	X	30	process, solution mini tion of fossil fuel, or	ject at this facility fluids f mining of sulfur by the ing of minerals, in situ or recovery of geothermal e	Frasch ombus-	3.	x	
hydrocarbons? (FORM 4) I. Is this facility a proposed st one of the 28 industrial ca structions and which will pe per year of any air polluta	ationary source which is tegories listed in the in- potentially emit 100 tons	34 35	36	NOT one of the 28 in instructions and which	osed stationary source w ndustrial categories listed h will potentially emit 25 lutant regulated under the	in the 0 tons	37	з	_
Clean Air Act and may afformattainment area? (FORM 5)		40 41	42	Air Act and may affect area? (FORM 5)	ct or be located in an attai	nment	43	<u> </u>	_
III. NAME OF FACILITY		I N							7
18 16 - 28 30	VHILEMAN	IN	<u> </u>		es de la companya de	70177822	69		٠. چ
	NAME & TITLE (last, fir)		B. PHONE (area code &	no.)			Ś
2 TURRI, CHAI	RLES - C	hem	ist	2	1 5 8 2 8 3	3 0 0	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1		:, -
V. FACILITY MAILING ADDRES		14.	公	45 46	- 48 49 - 51 52	# . * * * * * * * * * * * * * * * * * *		in.	ź
3 8 0 1 WASH II	A. STREET OR P.O.	BOX)		
CONSHOHOCI	CITY OR TOWN		· · · · ·	C.STATE D. ZIP C	2 8	July			A
VI. FACILITY LOCATION					A SAME SEAL OF THE			· Ki	4
A. STREET, R 5 8 0 1 WASHIN	GTON ST	PECIFIC	IDENTIF	ER 27.1.3					
	COUNTY NAME	*,0.50%		45					
MONTGOMERY.	CITY OR TOWN		1	D.STATE E. ZIP C	ODE F. COUNTY CO	DE			
6 CONSHOHOCI			•	PA 194	2 8				
EPA Form 3510-1 (6-80)				40 41 42 47	51 32 - 94	CONTIN	LUE C	N RE	<u>.</u>

I OIIII APPLOVEU OIVID IVO. 158-H0175

VII. SIC CODES (4-digit, in order of priority)	
A. FIRST	B. SECOND AND AND AND AND AND AND AND AND AND A
(specify)	(specify) SOLUBLE OILS
SULFATED OILS c. THIRD	ts its - its SOLUBLE OILS
c (specify)	c (specify)
NATURALLY OCCURING OILS	MODIFIED FATTY OILS
VIII. OPERATOR INFORMATION	
A.1	NAME B. Is the name liste Item VIII-A also
ODEL TO WHITE MAN INC	Öwner?
8 REILLY-WHITEMAN INC	· X YES N
15 16 C. STATULOF OPERATOR (Enter the appropriate letter in	to the answer box; if "Other", specify,] D. PHONE (area code & no.)
F = FEDERAL M = PUBLIC (other than federal or state)	(specify)
S = STATE O = OTHER (specify) P = PRIVATE	P A 2 1 5 8 2 8 3 8 0 0 15 16 - 16 19 - 21 22 - 22 22 22 22 22 23 22 23 24 24
E. STREET OR P.O. BOX	
801 WASHINGTON ST.	
26 10 10 10 10 10 10 10 10 10 10 10 10 10	55
F. CITY OR TOWN	G.STATE H. ZIP CODE IX: INDIAN LAND Is the facility located on Indian lands?
всоиѕноноскеи	PA 194 28 YES X NO
15 16 75 75 75 75 75 75 75 75 75 75 75 75 75	40 41 42 47
X. EXISTING ENVIRONMENTAL PERMITS	
	Ir Emissions from Proposed Sources)
9 N	
15 16 17 18 30 15 16 47 18	30
B. Uic (Underground Injection of Fluids)	E. OTHER (specify) (specify)
9 U	
15 16 17 16 30 15 16 17 18.	E. OTHER (specify)
	(specify)
9 R 15 16 17 18 30 16 17 18	1 20
XI. MAP	
	extending to at least one mile beyond property boundaries. The map must show
	sting and proposed intake and discharge structures, each of its hazardous waste here it injects fluids underground. Include all springs rivers and other surface
water bodies in the map area. See instructions for precise re	
XII. NATURE OF BUSINESS (provide a brief description)	
, · · · · · · · · · · · · · · · · · · ·	TETAL-WORKING, TEXTILE AND LEATHER INDUSTRIES
ALSO DEFOAMERS AND SOFTENERS	FOR ALUMINA AND PAPER INDUSTRIES.
5	
	•
· ·	
XIII. CERTIFICATION (see instructions)	
I certify under penalty of law that I have personally exam	nined and am familiar with the information submitted in this application and all
attachments and that, based on my inquiry of those pe	ersons immediately responsible for obtaining the information contained in the
application, I believe that the information is true, accura false information, including the possibility of fine and imp	te and complete. I am aware that there are significant penalties for submitting
A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE C. DATE SIGNED
	11121-1-100
Daniel S. Whiteman, Jr., President	Willie 11/19
COMMENTS FOR OFFICIAL USE ONLY	
Ĉ	Company of the Compan
15 16	55
EPA Form 3510-1 (6-80) REVERSE	

U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)

	I. EPA I.D. NUMBER												
-	F	\mathbf{P}	Α	D	0	0	2	3	5	1	7	8	1
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APPROVED (yr, mo., & day)	COMMENTS
	के or main, तरिमुख इंकार किल की अमेरी हैं। वर्ति किलीवनिविधि 💎
I. FIRST OR REVISED APPLICATION	
Place an "X" in the appropriate box in A or B below (mark one box only) to indicevised application. If this is your first application and you already know your face PA I.D. Number in Item I above.	icate whether this is the first application you are submitting for your facility acility's EPA I.D. Number, or if this is a revised application, enter your facili
A. FIRST APPLICATION (place an "X" below and provide the appropriate of	こここで、「は大変的」、1919年でも出て、1919年に対しては、1917年には、1917
X1. EXISTING FACILITY (See instructions for definition of "existing" for Complete item below.)	FOR NEW FACILI
FOR EXISTING FACILITIES, PROVIDE THE DOPERATION BEGAN OR THE DATE CONSTRUCTION (use the boxes to the left).	OATE (78, mo., & day) OF UCTION COMMENCED TION BEGAN OR EXPECTED TO BE
B. REVISED APPLICATION (place an "X" below and complete Item I about 1. FACILITY HAS INTERIM STATUS	De)
III. PROCESSES – CODES AND DESIGN CAPACITIES	
A. PROCESS CODE — Enter the code from the list of process codes below that I entering codes. If more lines are needed, enter the code(s) in the space provice describe the process (including its design capacity) in the space provided on the	ded. If a process will be used that is not included in the list of codes below, t
 PROCESS DESIGN CAPACITY — For each code entered in column A enter t AMOUNT — Enter the amount. UNIT OF MEASURE — For each amount entered in column B(1), enter ti 	
measure used. Only the units of measure that are listed below should be u	ised.
PRO APPROPRIATE UNITS OF CESS MEASURE FOR PROCESS PROCESS CODE DESIGN CAPACITY	PRO- APPROPRIATE UNITS OF CESS MEASURE FOR PROCESS PROCESS CODE DESIGN CAPACITY
Storage:	Treatment:
CONTAINER (barrel, drum, etc.) 501 GALLONS OR LITERS TANK 502 GALLONS OR LITERS WASTE PILE 503 CUBIC YARDS OR	TANK TO1 GALLONS PER DAY OR LITERS PER DAY SURFACE IMPOUNDMENT TO2 GALLONS PER DAY OR
SURFACE IMPOUNDMENT 504 GALLONS OR LITERS	INCINERATOR T03 TONS PER HOUR OR METRIC TONS PER HOUR;
Disposal: INJECTION WELL D79' GALLONS OR LITERS	GALLONS PER HOUR OR LITERS PER HOUR
LANDFILL D80 ACRE-FEET (the volume that would cover one acre to a	OTHER (Use for physical, chemical, TO4 GALLONS PER DAY OR thermal or biological treatment. LITERS PER DAY
LANDFILL D80 ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER	thermal or biological trealment. processes not occurring in tanks, surface impoundments or inciner.
LANDFILL D80 ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER LAND APPLICATION D81 ACRES OR HECTARES OCEAN DISPOSAL D82 GALLONS PER DAY OR LITERS PER DAY	thermal or biological treatment. LITERS PER DAY processes not occurring in tanks,
LANDFILL D80 ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER LAND APPLICATION D81 ACRES OR HECTARES OCEAN DISPOSAL D82 GALLONS PER DAY OR	thermal or biological trealment LITERS PER DAY processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in
LANDFILL D80 ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER LAND APPLICATION OCEAN DISPOSAL D81 ACRES OR HECTARES GALLONS PER DAY SURFACE IMPOUNDMENT D83 GALLONS OR LITERS	thermal or biological trealment Processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)
LANDFILL D80 ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER LAND APPLICATION OCEAN DISPOSAL SURFACE IMPOUNDMENT D81 ACRES OR HECTARES D82 GALLONS PER DAY OR LITERS PER DAY SURFACE IMPOUNDMENT D83 GALLONS OR LITERS UNIT OF MEASURE CODE UNIT OF MEASURE GALLONS LITERS PER DAY	thermal or biological trealment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.) UNIT OF UNIT (MEASURE MEASU CODE UNIT OF MEASURE CODE V ACRE-FEET. A D HECTARE-METER
LANDFILL D80 ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER LAND APPLICATION OCEAN DISPOSAL SURFACE IMPOUNDMENT D81 ACRES OR HECTARES B82 GALLONS PER DAY OR LITERS PER DAY UNIT OF MEASURE UNIT OF MEASURE CODE UNIT OF MEASURE GALLONS G LITERS PER DAY LITERS L TONS PER HOUR CUBIC YARDS C GALLONS PER HOUR CUBIC METERS C GALLONS PER HOUR	thermal or biological trealment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item.III-C.) UNIT OF UNIT (MEASURE MEASURE CODE V ACRE-FEET. A D HECTARE-METER F HOUR W ACRES. B R E HECTARES O
LANDFILL D80 ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER LAND APPLICATION OCEAN DISPOSAL SURFACE IMPOUNDMENT D81 ACRES OR HECTARES B82 GALLONS PER DAY OR LITERS PER DAY UNIT OF MEASURE UNIT OF MEASURE CODE UNIT OF MEASURE GALLONS G LITERS PER DAY LITERS L TONS PER HOUR CUBIC YARDS CUBIC METERS C GALLONS PER HOUR GALLONS PER DAY U LITERS PER HOUR	thermal or biological trealment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.) UNIT OF UNIT (MEASURE CODE UNIT OF MEASURE CODE V ACRE-FEET A D HECTARE-METER F HOUR W ACRES B R E HECTARES O
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LANDFILL D80 ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER LAND APPLICATION OCEAN DISPOSAL SURFACE IMPOUNDMENT D81 ACRES OR HECTARES B82 GALLONS PER DAY OR LITERS PER DAY SURFACE IMPOUNDMENT D83 GALLONS OR LITERS UNIT OF MEASURE CODE UNIT OF MEASURE CODE UNIT OF MEASURE CUBIC YARDS CUBIC METERS	thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.] UNIT OF UNIT (MEASURE MEASURE CODE UNIT OF MEASURE CODE V ACRE-FEET A D HECTARE-METER F HOUR W ACRES B R E HECTARES Q below): A facility has two storage tanks, one tank can hold 200 gallons and the
LANDFILL D80 ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER LAND APPLICATION OCEAN DISPOSAL SURFACE IMPOUNDMENT D81 ACRES OR HECTARES D82 GALLONS PER DAY OR LITERS PER DAY LITERS PER DAY UNIT OF MEASURE CODE UNIT OF MEASURE CODE UNIT OF MEASURE GALLONS. G LITERS PER DAY LITERS L TONS PER HOUR CUBIC YARDS. CUBIC YARDS. CUBIC METERS C	thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.) UNIT OF UNIT OF MEASURE MEASU CODE UNIT OF MEASURE CODE V ACRE-FEET. ACRE-FE
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PAGE 2 OF 5

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CONTINUE ON PAC

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

is composed of two underground enclosed pits, which are poured concrete faced with acid resistant brick. The treating area consists of three wooden and two metal tanks. Pipes are used to connect plant and lab drains to the collecting area and are also used to connect the

Our existing facility consists of a collecting area and a treating area. The collecting area

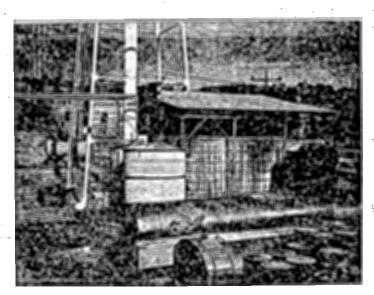
III. PROCESSES (continued)

EPA Form 3510-3 (6-89)

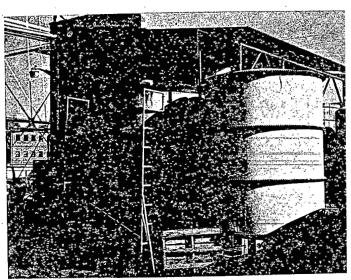
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IV. DESCRIPTION OF HAZARDOUS WASTES (co E. USE THIS SPACE TO LIST ADDITIONAL PRO	OCESS CODES FROM ITEM D(1) ON PAGE 3.	
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V. FACILITY DRAWING	page 5 a scale drawing of the facility (see instructions for m	ora dataill
VI. PHOTOGRAPHS	page 5 a scale drawing of the facility (see instructions for in	ore detair).
	ial or ground—level) that clearly delineate all existing	structures; existing storage,
treatment and disposal areas; and sites of future sto	rage, treatment or disposal areas (see instructions for	more detail):
VII. FACILITY GEOGRAPHIC LOCATION		
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4 0 4 2 0 57 68 59 71 VIII. FACILITY OWNER	$\begin{array}{c c} 7 & 5 \\ \hline 72 & -72 \end{array}$	$ \begin{array}{ c c c c c c c c c c c c c c c c c c c$
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VIII. FACILITY OWNER X A. If the facility owner is also the facility operator as skip to Section IX below.	listed in Section VIII on Form 1, "General Information", pl	$\begin{array}{c c} 1 & 7 & 2 & 7 \\ \hline 1 & 7 & 77 & 79 \end{array}$ ace an "X" in the box to the left and
VIII. FACILITY OWNER A. If the facility owner is also the facility operator as skip to Section IX below. B. If the facility owner is not the facility operator as	listed in Section VIII on Form 1, "General Information", pl	$\frac{1}{1} \frac{7}{76} \frac{2}{77} \frac{7}{77} \frac{7}{79}$ ace an "X" in the box to the left and
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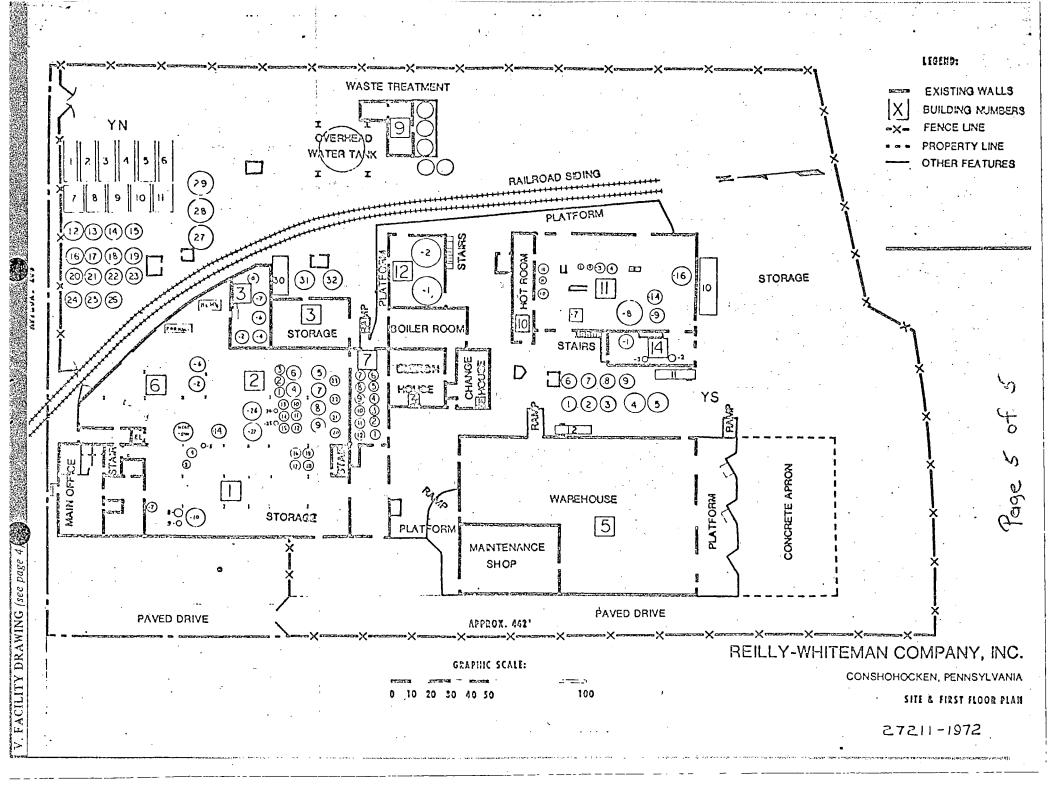
VI - Photographs -



Reilly Whiteman



Reilly Wilhiteman





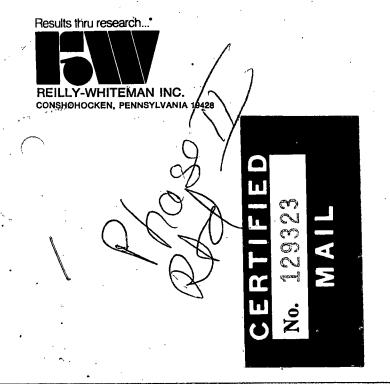
ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER	•PAD002351781	/#************************************
•	REILLY SHITEBAN INC	
	801 WASHINGTON ST CONSHOHOCKEN	Pa 19028
	1.3436	
INSTALLATION ADDRESS	801 WASHINGTON STREET CONSHOHOCKEN	PA 19428
rm 8700-12B (4-80)	10/09/80	

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	CITY OR TOWN ST	194	2 8 51	energy ,				٠,	
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	2 Charles Turri Chemist	45	2/	5 8 3	8 .	38	0	5	
~	V. OWNERSHIP A. NAME OF INSTALLATION'S LEGAL OWNER	R						1	u
TACH	8 Reilly Whiteman Inc					\perp	55		
A DE	(enter the appropriate letter into box) VI. TYPE OF HAZARDOUS WASTE ACTIVE			n the ap					
	F = FEDERAL M = NON-FEDERAL M = NON-FEDERAL M = S6 M = GENERATION 57 C. TREAT/STORE/DISPOSE 59	D. UN	IDERGR	OUND	,		,		1
	VII. MODE OF TRANSPORTATION (transporters only — enter "X" in the appr.	opriate bo. E. OTHER (
	VIII. FIRST OR SUBSEQUENT NOTIFICATION		•		; ·	٠,			
	Mark "X" in the appropriate box to indicate whether this is your installation's first notificate of this is not your first notification, enter your Installation's EPA I.D. Number in the space of	on of hazar rovided belo	dous was ow.	te activit	or a s	ubseq	uent n	otifica	tion.
				C. INST	ALLA	TION	'S EP	4 I.D. I	NO.
	A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (com	plete item (C)						
	IX. DESCRIPTION OF HAZARDOUS WASTES			. 5 '3				· * *	
	Please go to the reverse of this form and provide the requested information.				CON	TINI	IF ON	REVE	RSF

A. HAZARDOUS WASTES FROM NON—SPECIFIC SOURCES. Enter the four—digit number from 40 CFR Part 261.31 for each listed hazardous waste from non—specific sources your installation handles. Use additional sheets if necessary. B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four—digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary. B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four—digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary. C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four—digit number from 40 CFR Part 281.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary. D. LISTED INFECTIOUS WASTES. Enter the four—digit number from 40 CFR Part 281.33 for each chemical substance your installation handles. Use additional sheets if necessary. D. LISTED INFECTIOUS WASTES. Enter the four—digit number from 40 CFR Part 281.34 for each listed hazardous waste from hospitals, weterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary. D. LISTED INFECTIOUS WASTES. Enter the four—digit number from 40 CFR Part 281.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary. D. LISTED INFECTIOUS WASTES. Enter the four—digit number from 40 CFR Part 281.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary. D. LISTED INFECTIOUS WASTES. Enter the four—digit number from 40 CFR Part 281.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets	IA. DES	SCRIPTION OF HAZ	LARDOUS WASTES	(continuea from	<i>jrontj</i>						
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Ms. Shirley D. Bulkin
Chief, RCRA Administrative Support Section
Permit Enforcement Branch - Enforcement Div.
United States Environmental Protection Agency
Region III
6th & Walnut Streets
Philadelphia, PA 19106

